

STATE OF SOUTH CAROLINA

(Caption of Case)

IN THE MATTER OF PETITION FOR APPROVAL  
OF NEXTEL SOUTH CORP.'S ADOPTION OF TH  
E INTERCONNECTION AGREEMENT BETWEEN  
SPRINT COMMUNICATIONS L.P., SPRINT  
SPECTRUM L.P. D/B/A SPRINT PCS AND  
BELLSOUTH TELECOMMUNICATIONS, INC. D/  
B/A AT&T SOUTH CAROLINA D/B/A AT&T  
SOUTHEAST

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

COVER SHEET

DOCKET  
NUMBER: 2007 - 255 - C

(Please type or print)

Submitted by: Patrick W. Turner

Address: Suite 5200

1600 Williams Street

Columbia, South Carolina 29201

SC Bar Number: 6566

Telephone: 803-401-2900

Fax: 803-254-1731

Other: \_\_\_\_\_

Email: patrick.turner.1@bellsouth.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition

☐ Request for item to be placed on Commission's Agenda  
expeditiously

☐ Other: \_\_\_\_\_

INDUSTRY (Check one)

- ☐ Electric  
☐ Electric/Gas  
☐ Electric/Telecommunications  
☐ Electric/Water  
☐ Electric/Water/Telecom.  
☐ Electric/Water/Sewer  
☐ Gas  
☐ Railroad  
☐ Sewer  
☒ Telecommunications  
☐ Transportation  
☐ Water  
☐ Water/Sewer  
☐ Administrative Matter  
☐ Other: \_\_\_\_\_

NATURE OF ACTION (Check all that apply)

- |  |  |  |
|--|--|--|
| <input type="checkbox"/> Affidavit                 | <input checked="" type="checkbox"/> Letter                 | <input type="checkbox"/> Request                   |
| <input type="checkbox"/> Agreement                 | <input type="checkbox"/> Memorandum                        | <input type="checkbox"/> Request for Certification |
| <input type="checkbox"/> Answer                    | <input checked="" type="checkbox"/> Motion                 | <input type="checkbox"/> Request for Investigation |
| <input type="checkbox"/> Appellate Review          | <input type="checkbox"/> Objection                         | <input type="checkbox"/> Resale Agreement          |
| <input type="checkbox"/> Application               | <input type="checkbox"/> Petition                          | <input type="checkbox"/> Resale Amendment          |
| <input type="checkbox"/> Brief                     | <input type="checkbox"/> Petition for Reconsideration      | <input type="checkbox"/> Reservation Letter        |
| <input checked="" type="checkbox"/> Certificate    | <input type="checkbox"/> Petition for Rulemaking           | <input type="checkbox"/> Response                  |
| <input type="checkbox"/> Comments                  | <input type="checkbox"/> Petition for Rule to Show Cause   | <input type="checkbox"/> Response to Discovery     |
| <input type="checkbox"/> Complaint                 | <input type="checkbox"/> Petition to Intervene             | <input type="checkbox"/> Return to Petition        |
| <input type="checkbox"/> Consent Order             | <input type="checkbox"/> Petition to Intervene Out of Time | <input type="checkbox"/> Stipulation               |
| <input type="checkbox"/> Discovery                 | <input type="checkbox"/> Prefiled Testimony                | <input type="checkbox"/> Subpoena                  |
| <input checked="" type="checkbox"/> Exhibit        | <input type="checkbox"/> Promotion                         | <input type="checkbox"/> Tariff                    |
| <input type="checkbox"/> Expedited Consideration   | <input type="checkbox"/> Proposed Order                    | <input type="checkbox"/> Other: _____              |
| <input type="checkbox"/> Interconnection Agreement | <input type="checkbox"/> Protest                           |  |
| <input type="checkbox"/> Interconnection Amendment | <input type="checkbox"/> Publisher's Affidavit             |  |
| <input type="checkbox"/> Late-Filed Exhibit        | <input type="checkbox"/> Report                            |  |

Print Form

Reset Form



**Patrick W. Turner**  
General Counsel-South Carolina  
Legal Department

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patrick.turner.1@att.com  
www.att.com

November 16, 2007

The Honorable Charles Terreni  
Chief Clerk of the Commission  
Public Service Commission of South Carolina  
Post Office Drawer 11649  
Columbia, South Carolina 29211

Re: In the Matter of Petition for Approval of Nextel South Corp.'s Adoption of the Interconnection Agreement Between Sprint Communications L.P., Sprint Spectrum L.P. d/b/a Sprint PCS and BellSouth Telecommunications, Inc. d/b/a AT&T South Carolina, d/b/a AT&T Southeast  
Docket No. 2007-255-C

In the Matter of Petition for Approval of NPCR, Inc. d/b/a Nextel Partners' Adoption of the Interconnection Agreement Between Sprint Communications L.P./ Sprint Spectrum L.P. d/b/a Sprint PCS and BellSouth Telecommunications, Inc. d/b/a AT&T South Carolina, d/b/a AT&T Southeast  
Docket No. 2007-256-C

Dear Mr. Terreni:

Enclosed for filing are an original and one (1) copy of BellSouth Telecommunications, Inc.'s d/b/a AT&T South Carolina ("AT&T") Motion for Admission *Pro Hac Vice* of John T. Tyler in the above-referenced matters.

By copy of this letter, I am serving all parties of record with a copy of this Motion as indicated on the attached Certificate of Service.

Sincerely,

Patrick W. Turner

PWT/nml

Enclosure

cc: All Parties of Record

DM5 #685480

**THIS DOCUMENT IS AN EXACT DUPLICATE OF THE E-FILED COPY SUBMITTED TO THE COMMISSION IN ACCORDANCE WITH ITS ELECTRONIC FILING INSTRUCTIONS.**



Proud Sponsor of the U.S. Olympic Team

**BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA**

IN THE MATTER OF PETITION FOR )  
APPROVAL OF NEXTEL SOUTH )  
CORP.'S ADOPTION OF THE )  
INTERCONNECTION AGREEMENT )  
BETWEEN SPRINT COMMUNICATIONS )  
L.P., SPRINT SPECTRUM L.P. D/B/A )  
SPRINT PCS AND BELLSOUTH )  
TELECOMMUNICATIONS, INC. D/B/A )  
AT&T SOUTH CAROLINA D/B/A AT&T )  
SOUTHEAST )  
)

Docket No. 2007-255-C

IN THE MATTER OF PETITION FOR )  
APPROVAL OF NPCR, INC. D/B/A )  
NEXTEL PARTNERS' ADOPTION OF )  
THE INTERCONNECTION )  
AGREEMENT BETWEEN SPRINT )  
COMMUNICATIONS L.P., SPRINT )  
SPECTRUM L.P. D/B/A SPRINT PCS )  
AND BELLSOUTH )  
TELECOMMUNICATIONS, INC. D/B/A )  
AT&T SOUTH CAROLINA D/B/A AT&T )  
SOUTHEAST )  
)

Docket No. 2007-256-C

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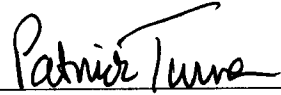
**MOTION FOR ADMISSION PRO HAC VICE**

BellSouth Telecommunications, Inc.'s d/b/a AT&T South Carolina ("AT&T") respectfully moves the Public Service Commission of South Carolina ("the Commission") to permit John T. Tyler, to practice *pro hac vice* before the Commission in the above-referenced matters. Pursuant to Rule 404 of the South Carolina Appellate Court Rules, Mr. Tyler, together with the undersigned counsel of record, have filed an application for admission *pro hac vice* with the Supreme Court of South Carolina. Exhibit A to this Motion is a file-stamped copy of that

application, along with a Certificate of Service indicating that the application and the \$250 filing fee have been filed with the Supreme Court.

Respectfully submitted, this 16<sup>th</sup> day of November 2007.

AT&T SOUTH CAROLINA

A handwritten signature in black ink, appearing to read "Patrick W. Turner", is written over a horizontal line.

PATRICK W. TURNER

Suite 5200

1600 Williams Street

Columbia, South Carolina 29201

(803) 401-2900

685486

# EXHIBIT A



**Patrick W. Turner**  
General Counsel-South Carolina  
Legal Department

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patrick.turner.1@att.com  
www.att.com

November 16, 2007

**RECEIVED**

**NOV 16 2007**

**S.C. SUPREME COURT**

Ms. Gail Watts  
Deputy Clerk for Admissions  
South Carolina Supreme Court of Bar Admissions  
Post Office Box 11330  
Columbia, South Carolina 29211

Re: In the Matter of Petition for Approval of Nextel South Corp.'s Adoption of the Interconnection Agreement Between Sprint Communications L.P., Sprint Spectrum L.P. d/b/a Sprint PCS and BellSouth Telecommunications, Inc. d/b/a AT&T South Carolina, d/b/a AT&T Southeast  
Docket No. 2007-255-C

In the Matter of Petition for Approval of NPCR, Inc. d/b/a Nextel Partners' Adoption of the Interconnection Agreement Between Sprint Communications L.P./ Sprint Spectrum L.P. d/b/a Sprint PCS and BellSouth Telecommunications, Inc. d/b/a AT&T South Carolina, d/b/a AT&T Southeast  
Docket No. 2007-256-C

Dear Ms. Watts:

Pursuant to Rule 404 of the S.C.A.C.R., enclosed for filing are the original and one copy of an Application for Admission *Pro Hac Vice* of John T. Tyler in the above-referenced matters with the requested filing fee of \$250.00. Also enclosed is an Order from the Public Service Commission Granting Motion for Consolidation of Dockets.

If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,

Patrick W. Turner

PWT/nml  
Enclosures  
DM5 # 685484

**BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA**

IN THE MATTER OF PETITION FOR )  
APPROVAL OF NEXTEL SOUTH )  
CORP.'S ADOPTION OF THE )  
INTERCONNECTION AGREEMENT )  
BETWEEN SPRINT COMMUNICATIONS )  
L.P., SPRINT SPECTRUM L.P. D/B/A )  
SPRINT PCS AND BELL SOUTH )  
TELECOMMUNICATIONS, INC. D/B/A )  
AT&T SOUTH CAROLINA D/B/A AT&T )  
SOUTHEAST )

---

Docket No. 2007-255-C

**RECEIVED**

NOV 16 2007

**S.C. SUPREME COURT**

IN THE MATTER OF PETITION FOR )  
APPROVAL OF NPCR, INC. D/B/A )  
NEXTEL PARTNERS' ADOPTION OF )  
THE INTERCONNECTION )  
AGREEMENT BETWEEN SPRINT )  
COMMUNICATIONS L.P., SPRINT )  
SPECTRUM L.P. D/B/A SPRINT PCS )  
AND BELL SOUTH )  
TELECOMMUNICATIONS, INC. D/B/A )  
AT&T SOUTH CAROLINA D/B/A AT&T )  
SOUTHEAST )

---

Docket No. 2007-256-C

**APPLICATION FOR ADMISSION  
PRO HAC VICE**

Comes now John T. Tyler, applicant herein, and respectfully represents the following:

1. Applicant is an employee of BellSouth Telecommunications, Inc., 675 West Peachtree Street, NE, Atlanta, Fulton County, Georgia, 30375, Telephone Number 404-335-0757, Fax Number 404 614-4054, as in-house counsel.

2. Applicant has been retained personally or as a member of the above named legal department to provide legal representation in connection with the above case now pending before named court of the State of South Carolina.

3. Since October of 1997, applicant has been, and presently is, a member in good standing of the bar of the highest court of the State of Georgia. Attached is a certificate of good standing.

4. Applicant has been admitted to practice before the following courts:

Court:	Date Admitted.
United States District Ct. – N.Dist. GA	October 24, 1997
United States Ct. of Appeals – 11 <sup>th</sup> Circuit	October 24, 1997
All Georgia Courts – Supreme, Superior and State	October 24, 1997

Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency.

6. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked.

7. Applicant never has had any certificate or privilege to appear and practice before any administrative body suspended or revoked.

8. Local counsel of record associated with applicant in this case is Patrick W. Turner of BellSouth Telecommunications, Inc., Suite 5200, 1600 Williams Street, Richland County, Columbia, South Carolina, 29201, Telephone Number (803) 401-2900.

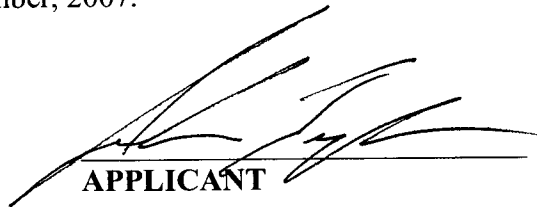
9. Applicant previously filed an application to appear *pro hac vice* in South Carolina in Docket No. 2005-82-C.



10. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

11. Applicant respectfully requests to be admitted to practice in the above named court for this case only.

DATED this 16 day of November, 2007.



APPLICANT

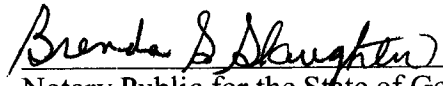
## VERIFICATION

STATE OF GEORGIA     )  
                                  )  
COUNTY OF FULTON    )

I, John T. Tyler, do hereby swear or affirm under penalty of perjury that I am the applicant in the above styled matter; that I have read the foregoing application and know the contents hereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true.

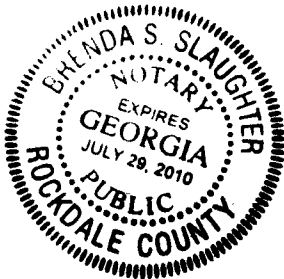
  
APPLICANT/AFFIANT

Subscribed and sworn to before me this 15<sup>TH</sup> day of November, 2007.

  
Notary Public for the State of Georgia

Brenda S. Slaughter  
Notary Public, Rockdale County, Georgia  
My Commission Expires July 29, 2010

My Commission Expires: \_\_\_\_\_



### **LOCAL COUNSEL CONSENT**

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 16<sup>th</sup> day of November, 2007.

  
\_\_\_\_\_  
**Local Counsel of Record**

## **CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by hand delivery mail addressed to: South Carolina Supreme Court Office of Bar Admissions, P.O. Box 11330, Columbia, SC 29211, accompanied by payment of the \$250 filing fee payable to the South Carolina Supreme Court on this 16 day of November, 2007.



APPLICANT/AFFIANT

# STATE BAR OF GEORGIA



*Lawyers Serving the Public and the Justice System*

Mr. John Thomas Tyler  
AT&T Southeast  
675 West Peachtree Street, Suite 4300  
Atlanta, GA 30375

**CURRENT STATUS:** Active Member-Good Standing

**DATE OF ADMISSION TO PRACTICE:** 10/24/1997

**Attorney Bar Number:** 721154

Today's Date: November 15, 2007

Listed below are the public disciplinary actions, if any, which have been taken against this member:

State Disciplinary Board Docket #	Supreme Court Docket #	Disposition
N/A	N/A	N/A

The prerequisites for practicing law in the State of Georgia are as follows:

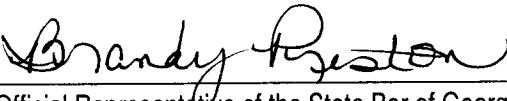
- Must be certified by the Office of Bar Admissions, either by Exam, or on Motion (Reciprocity).
- Sworn in to the Superior Court in Georgia, which is the highest court needed for individuals to practice law in the State of Georgia.
- Enrolled with the State Bar of Georgia, which is an arm of the Supreme Court of Georgia.

Attorneys licensed in Georgia and whose membership is current are eligible to practice law in Superior Court. Attorneys may, upon application, apply for admission to the Supreme, District and State Court of Appeals.

Under the privacy/confidentiality provision of the Bar Rule 4-221(d), any complaint against a member resolved prior to the filing and docketing of a disciplinary case in the Supreme Court is not a matter of public record, and may not be revealed without a waiver from the member. It is the policy of the State Bar of Georgia to answer any inquiry about a member by disclosing only those complaints that have been docketed in the Supreme Court. With respect to matters that are currently pending as active, undocketed cases, when an inquiry is received, the State Bar of Georgia shall not disclose the existence of those complaints. Such non-disclosure should not be construed to confirm the existence of confidential complaints since the vast majority of members in good standing are not the subjects of such confidential complaints.

This member is currently in "good standing" as termed and defined by **State Bar Rule 1-204**. The member is current in license fees and is not suspended or disbarred as of the date of this letter.

## STATE BAR OF GEORGIA

  
Official Representative of the State Bar of Georgia

### HEADQUARTERS

104 Marietta Street, Suite 100  
Atlanta, Georgia 30303  
(404) 527-8700 ■ (800) 334-6865  
FAX (404) 527-8717  
www.gabar.org

### SOUTH GEORGIA

244 E. Second Street (Zip 31794)  
P.O. Box 1390  
Tifton, Georgia 31793-1390  
(229) 387-0446 ■ (800) 330-0446  
FAX (229) 382-7435

BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA

DOCKET NOS. 2007-255-C and 2007-256-C - ORDER NO. 2007-724

OCTOBER 9, 2007

IN RE: Docket No. 2007-255-C – Petition for	)	ORDER GRANTING
Approval of Nextel South Corp.'s Adoption	)	MOTION FOR
of the Interconnection Agreement between	)	CONSOLIDATION OF
Sprint Communications L.P., Sprint Spectrum	)	DOCKETS
L.P. d/b/a Sprint PCS and BellSouth	)	
Telecommunications, Inc. d/b/a AT&T South	)	
Carolina d/b/a AT&T Southeast	)	
	)	
and	)	
	)	
Docket No. 2007-256-C – Petition for	)	
Approval of NPCR, Inc. d/b/a Nextel	)	
Partners' Adoption of the Interconnection	)	
Agreement between Sprint Communications	)	
L.P., Sprint Spectrum L.P. d/b/a Sprint PCS	)	
and BellSouth Telecommunications, Inc.	)	
d/b/a AT&T South Carolina d/b/a AT&T	)	
Southeast	)	

This matter comes before the Public Service Commission of South Carolina (Commission) on the Motion of Nextel South Corp. (Nextel South) and NPCR, Inc. d/b/a Nextel Partners (Nextel Partners) (collectively, Nextel) to consolidate Docket No. 2007-255-C and Docket No. 2007-256-C presently pending before the Commission.

On July 2, 2007, Nextel filed with the Commission separate petitions for adoption of the interconnection agreement between Sprint Communications L.P., Sprint Spectrum L.P. d/b/a Sprint PCS (Sprint) and BellSouth Telecommunications, Inc. d/b/a AT&T

South Carolina d/b/a AT&T Southeast (AT&T). The Commission established Docket No. 2007-255-C to address the petition for adoption of Nextel South and Docket No. 2007-256-C to address the petition for adoption of Nextel Partners.

On September 12, 2007, Nextel filed a Motion to Consolidate. Nextel asserts in its Motion that the substantive issues raised in the adoption petition proceedings are identical. For purposes of administrative efficiency and economy, Nextel requests the Commission fully consolidate the two proceedings for consideration of AT&T's motions to dismiss, for establishing a unified procedural schedule, and for reaching a final determination with regard to adoption petition proceedings. Further, Nextel suggests that the procedural deadlines and hearing date already established for Docket No. 2007-255-C be designated as the procedural schedule and hearing date for the consolidated proceedings. Nextel adds that counsel for AT&T and the Office of Regulatory Staff concur with the requested consolidation.

The Commission finds the Motion to Consolidate of Nextel reasonable and finds that judicial economy would be served by consolidating the two dockets, and therefore grants the Motion to Consolidate.

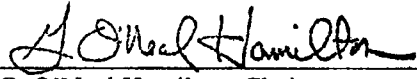
IT IS THEREFORE ORDERED THAT:

1. Nextel South Corp.'s and NPCR, Inc. d/b/a Nextel Partners' Motion to Consolidate Docket No. 2007-255-C and Docket No. 2007-256-C is hereby granted, and the procedural deadlines and hearing date already established for Docket No. 2007-255-C are designated as the procedural schedule and hearing date for the consolidated

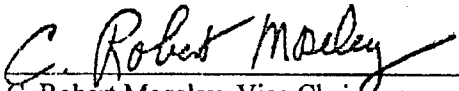
proceedings, subject to change by the Commission's Docketing Department if circumstances dictate.

2. This Order shall remain in full force and effect until further order of the Commission.

BY ORDER OF THE COMMISSION:

  
\_\_\_\_\_  
G. O'Neal Hamilton, Chairman

ATTEST:

  
\_\_\_\_\_  
C. Robert Moseley, Vice Chairman

(SEAL)



# CERTIFICATE OF SERVICE

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for AT&T South Carolina (“AT&T”) and that she has caused AT&T South Carolina’s Motion for Admission *Pro Hac Vice* of John T. Tyler in Docket Nos. 2007-255-C and 2007-256-C to be served upon the following on November 16, 2007.

Nanette S. Edwards, Esquire  
1441 Main Street, Suite 300  
Columbia, South Carolina 29201  
(Office of Regulatory Staff)  
**(U. S. Mail and Electronic Mail)**

Jocelyn G. Boyd, Esquire  
Staff Attorney  
S. C. Public Service Commission  
Post Office Box 11649  
Columbia, South Carolina 29211  
(PSC Staff)  
**(U. S. Mail and Electronic Mail)**

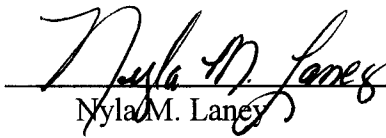
F. David Butler, Esquire  
Senior Counsel  
S. C. Public Service Commission  
Post Office Box 11649  
Columbia, South Carolina 29211  
(PSC Staff)  
**(U. S. Mail and Electronic Mail)**

Joseph Melchers  
Chief Counsel  
S.C. Public Service Commission  
Post Office Box 11649  
Columbia, South Carolina 29211  
(PSC Staff)  
**(U.S. Mail and Electronic Mail)**

J. Jeffrey Pascoe, Esquire  
Womble Carlyle Sandrige & Rice  
550 South Main Street, Suite 400  
Greenville, South Carolina 29601  
**(U.S. Mail and Electronic Mail)**

William R. L. Atkinson, Esquire  
Sprint Nextel Corporation  
223 Peachtree Street, Suite 2200  
Atlanta, Georgia 30303  
**(Via U. S. Mail)**

Joseph M. Chiarelli, Esquire  
Sprint Nextel Corporation  
6450 Sprint Parkway,  
Mailstop KSOPHNO214-2A671  
Overland Park, Kansas 66251  
**(Via U. S. Mail)**

  
Nyla M. Laney

683301